

AGNIFILO INTRATER

May 26, 2025

VIA ECF

Hon. Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *United States v. Combs*, 24-cr-542 (AS)

Dear Judge Subramanian:

We write pursuant to the Court's May 20, 2025 Order requiring that email correspondence concerning evidentiary objections or applications for relief be docketed by the end of the week it was originally sent. (ECF 342.) Accordingly, we are filing email correspondence from the defense.

Respectfully submitted,

/s/ Teny Geragos

Marc Agnifilo
Teny Geragos
Alexandra A.E. Shapiro
Jason A. Driscoll
Anna Estevao
Brian Steel
Nicole Westmoreland
Xavier Donaldson

cc: All counsel (by ECF)

Teny Geragos

From: Teny Geragos
Sent: Thursday, May 8, 2025 6:12 PM
To: Marc Agnifilo; Alexandra Shapiro; Anna Estevao; thesteellawfirm; Jason A. Driscoll; nw@westmorelandlawgroup.com; xdonaldson; Johnson, Emily (USANYS) 2; Smyser, Madison (USANYS); mary.slavik@usdoj.gov; Foster, Meredith (USANYS); Steiner, Mitzi (USANYS); Comey, Maurene (USANYS); SubramanianNYSDChambers
Subject: Re: 24cr542 USA v. Combs

Understood. Thank you.

Teny R. Geragos

From: Subramanian NYSD Chambers <SubramanianNYSDChambers@nysd.uscourts.gov>
Sent: Thursday, May 8, 2025 6:09:16 PM
To: Teny Geragos <teny@agilawgroup.com>; SubramanianNYSDChambers <SubramanianNYSDChambers@nysd.uscourts.gov>; Marc Agnifilo <marc@agilawgroup.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Anna Estevao <aestevao@harristrz.com>; thesteellawfirm <thesteellawfirm@msn.com>; Jason A. Driscoll <jdriscoll@shapiroarato.com>; nw@westmorelandlawgroup.com <nw@westmorelandlawgroup.com>; xdonaldson <xdonaldson@aol.com>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Smyser, Madison (USANYS) <madison.smyser@usdoj.gov>; mary.slavik@usdoj.gov <mary.slavik@usdoj.gov>; Foster, Meredith (USANYS) <meredith.foster@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>
Subject: RE: 24cr542 USA v. Combs

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This is fine, but the parties should be prepared to immediately give their strike once the other side has given theirs. No extended huddles will be permitted, so the parties should work in advance to come up with their lists.

From: Teny Geragos <teny@agilawgroup.com>
Sent: Thursday, May 8, 2025 6:04 PM
To: Subramanian NYSD Chambers <SubramanianNYSDChambers@nysd.uscourts.gov>; Marc Agnifilo <marc@agilawgroup.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Anna Estevao <aestevao@harristrz.com>; thesteellawfirm <thesteellawfirm@msn.com>; Jason A. Driscoll <jdriscoll@shapiroarato.com>; nw@westmorelandlawgroup.com; xdonaldson <xdonaldson@aol.com>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Smyser, Madison (USANYS) <madison.smyser@usdoj.gov>; mary.slavik@usdoj.gov; Foster, Meredith (USANYS) <meredith.foster@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>
Subject: RE: 24cr542 USA v. Combs

CAUTION - EXTERNAL:

Dear Chambers:

We apologize for the delay, but we have now conferred with AUSA Comey. We agree with the Court's proposal for the alternate jurors. We propose the following procedure for the principal jurors:

Stage 1: Trial Jurors

- Begin with the first 28 jurors
- 6 rounds:
 - Round 1: The government goes first with one strike and the defense goes second with two strikes
 - Round 2: The government goes first with one strike and the defense goes second with two strikes
 - Round 3: The government goes first with one strike and the defense goes second with two strikes
 - Round 4: The government goes first with one strike and the defense goes second with two strikes
 - Round 5: The government goes first with one strike and the defense goes second with one strike
 - Round 6: The government goes first with one strike and the defense goes second with one strike

Respectfully,
Teny

From: Subramanian NYSD Chambers <SubramanianNYSDChambers@nysd.uscourts.gov>

Sent: Thursday, May 8, 2025 5:34 PM

To: Marc Agnifilo <marc@agilawgroup.com>; Teny Geragos <teny@agilawgroup.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Anna Estevao <aestevao@harristrz.com>; thesteellawfirm <thesteellawfirm@msn.com>; Jason A. Driscoll <jdriscoll@shapiroarato.com>; nw@westmorelandlawgroup.com; xdonaldson <xdonaldson@aol.com>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Smyser, Madison (USANYS) <madison.smyser@usdoj.gov>; mary.slavik@usdoj.gov; Foster, Meredith (USANYS) <meredith.foster@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>

Subject: 24cr542 USA v. Combs

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Dear Counsel,

The Court has not yet heard from the parties concerning their specific proposal for the exercise of peremptory strikes tomorrow. Absent agreement on a different procedure, the peremptory strikes will be exercised in the following manner, consistent with both sides' request to proceed in rounds.

Stage 1: Trial jurors

- Begin with first 28 jurors
- 4 rounds
 - The Government goes first in rounds 1 and 3; defense goes first in rounds 2 and 4
 - The Government gets 2 strikes in rounds 1 and 2; defense gets 3 strikes
 - The Government gets 1 strike in rounds 3 and 4; defense gets 2 strikes
- Any waived strike; highest remaining jurors become qualified as alternates

Stage 2: Alternate jurors

- Begin with all remaining jurors
- The Government goes first; 1 strike at a time
- 3 strikes each; will qualify 12 (lowest number jurors)

Chambers of The Honorable Arun Subramanian

United States District Court
Southern District of New York
500 Pearl Street, Courtroom 15A
New York, NY 10007

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Teny Geragos

From: Teny Geragos
Sent: Wednesday, May 14, 2025 1:05 AM
To: SubramanianNYSDChambers; Comey, Maurene (USANYS); Johnson, Emily (USANYS) 2; Foster, Meredith (USANYS); Steiner, Mitzi (USANYS); Slavik, Christy (USANYS); Smyser, Madison (USANYS)
Cc: Marc Agnifilo; Anna Estevao; Alexandra Shapiro; Jason A. Driscoll; thesteellawfirm; xdonaldson; nw@westmorelandlawgroup.com
Subject: US v. Combs - 106 exhibits
Attachments: GX_proposed defense corrections.7z

Dear Chambers and Judge Subramanian:

After conferring with the government over the past week over 106 objections, they have informed us that they disagree with the defense's rule of completeness objections as to 7 exhibits. To facilitate the Court's ruling on these, we have included the government's proposed exhibits, and the defense's proposed exhibits that would satisfy our 106 objections.

Respectfully,
Teny



Teny Geragos
Partner, Agnifilo Intrater LLP
445 Park Avenue, 7th Floor | New York, NY 10022
o: (646) 205-4351 | c: [REDACTED]
teny@agilawgroup.com
www.agilawgroup.com

Teny Geragos

From: Teny Geragos
Sent: Wednesday, May 14, 2025 5:26 PM
To: Comey, Maurene (USANYS); SubramanianNYSDCChambers
Cc: Marc Agnifilo; Alexandra Shapiro; Jason A. Driscoll; Anna Estevao; xdonaldson; nw@westmorelandlawgroup.com; thesteellawfirm; Johnson, Emily (USANYS) 2; Slavik, Christy (USANYS); Steiner, Mitzi (USANYS); Smyser, Madison (USANYS); Foster, Meredith (USANYS)
Subject: Re: US v. Combs, 24 Cr. 542 (AS) - defense exhibits

Dear Chambers and AUSA Comey:

In the courtroom, I had asked AUSA Johnson if we could narrow the exhibits that would pertain to this issue to just the exhibits we had been conferring on with the government. Those are probably 2 to 3 exhibits maximum.

We would note for the court what we've already noted for the government which is that, as defense lawyers, we have to over-mark exhibits because there is no other way to have exhibits ready to refresh recollection or possibly introduce depending on what the witnesses answer is.

Teny R. Geragos

From: Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>
Sent: Wednesday, May 14, 2025 5:15 PM
To: SubramanianNYSDCChambers <SubramanianNYSDCChambers@nysd.uscourts.gov>
Cc: Marc Agnifilo <marc@agilawgroup.com>; Teny Geragos <teny@agilawgroup.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Jason A. Driscoll <jdriscoll@shapiroarato.com>; Anna Estevao <aestevao@harristrz.com>; xdonaldson <xdonaldson@aol.com>; nw@westmorelandlawgroup.com <nw@westmorelandlawgroup.com>; thesteellawfirm <thesteellawfirm@msn.com>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Slavik, Christy (USANYS) <Mary.Slavik@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Smyser, Madison (USANYS) <Madison.Smyser@usdoj.gov>; Foster, Meredith (USANYS) <Meredith.Foster@usdoj.gov>
Subject: US v. Combs, 24 Cr. 542 (AS) - defense exhibits

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Good afternoon,

The Government just received the defense exhibits in hard copy and has not yet received electronic copies. The hard copy exhibits consist of 383 exhibits, totaling hundreds of pages double sided, filling three multi-inch binders. It is simply not possible for the Government to review and identify objections to all of these exhibits by the end of the night, not to mention 7pm.

Federal Rule of Evidence 412(c)(1) places the burden on the proponent of an exhibit covered by the rule to "file a motion that specifically describes the evidence and states the purpose for which it is to be

offered.” Given the volume of exhibits, we ask that the defense be directed to compile a narrower list of exhibits that implicate the issues the Government flagged on the record today.

The Government also notes that unless the defense narrows the list of exhibits substantially, it will not be able to raise other evidentiary objections in advance of cross-examination tomorrow. We intend to ask the Court to preclude any exhibits from being admitted on cross-examination that we have not had sufficient opportunity to review and evaluate.

Respectfully,
Maurene Comey

Teny Geragos

From: Teny Geragos
Sent: Wednesday, May 14, 2025 7:03 PM
To: Comey, Maurene (USANYS); SubramanianNYSDChambers
Cc: Marc Agnifilo; Alexandra Shapiro; Jason A. Driscoll; Anna Estevao; xdonaldson; nw@westmorelandlawgroup.com; thesteellawfirm; Johnson, Emily (USANYS) 2; Slavik, Christy (USANYS); Steiner, Mitzi (USANYS); Smyser, Madison (USANYS); Foster, Meredith (USANYS)
Subject: Re: US v. Combs, 24 Cr. 542 (AS) - defense exhibits

Your Honor, I will send the seven exhibits (which we have already discussed with the government) shortly. I apologize for the delay, but my computer keeps crashing.

Teny R. Geragos

From: Subramanian NYSD Chambers <SubramanianNYSDChambers@nysd.uscourts.gov>
Sent: Wednesday, May 14, 2025 5:52 PM
To: Teny Geragos <teny@agilawgroup.com>; Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>; SubramanianNYSDChambers <SubramanianNYSDChambers@nysd.uscourts.gov>
Cc: Marc Agnifilo <marc@agilawgroup.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Jason A. Driscoll <jdriscoll@shapiroarato.com>; Anna Estevao <aestevao@harristrz.com>; xdonaldson <xdonaldson@aol.com>; nw@westmorelandlawgroup.com <nw@westmorelandlawgroup.com>; thesteellawfirm <thesteellawfirm@msn.com>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Slavik, Christy (USANYS) <Mary.Slavik@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Smyser, Madison (USANYS) <Madison.Smyser@usdoj.gov>; Foster, Meredith (USANYS) <Meredith.Foster@usdoj.gov>
Subject: RE: US v. Combs, 24 Cr. 542 (AS) - defense exhibits

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

1. The defense, having prepared these binders and being familiar with the contents, should identify any exhibits that involve Ms. Ventura's sexual conduct with other individuals in any way, shape or form. These exhibits should be identified to the government and provided to the Court by 7pm.
2. To the extent that either side wishes to submit letters regarding those exhibits provided to the Court, they may do so. Get them in as early as you can, but if 8pm doesn't work, that's fine. Try to do it tonight at some point so that the Court can review the exhibits, letters, and cited authorities before 8:30am.
3. The government can make any application relating to the other exhibits that it wishes, but the parties are reminded that there was a mutual failure to deal with these issues in advance of trial, and we've had several hearings in the weeks leading up to trial. So the Court will count on the parties to meet and confer in good faith to eliminate issues so as to avoid a preclusion motion.

From: Teny Geragos <teny@agilawgroup.com>
Sent: Wednesday, May 14, 2025 5:26 PM
To: Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>; Subramanian NYSD Chambers <SubramanianNYSDChambers@nysd.uscourts.gov>

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Teny R. Geragos

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Respectfully,
Maurene Comey

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To: Subramanian NYSD Chambers; Comey, Maurene (USANYS); SubramanianNYSDChambers
Cc: Marc Agnifilo; Alexandra Shapiro; Jason A. Driscoll; Anna Estevao; xdonaldson; nw@westmorelandlawgroup.com; thesteellawfirm; Johnson, Emily (USANYS) 2; Slavik, Christy (USANYS); Steiner, Mitzi (USANYS); Smyser, Madison (USANYS); Foster, Meredith (USANYS)
Subject: RE: US v. Combs, 24 Cr. 542 (AS) - defense exhibits
Attachments: GX B-640_defense proposed.pdf; GX B-629_defense proposed (& request combine with B-630).pdf; DX-1090.pdf; DX-1376.pdf; DX-1311.pdf; DX-1022.pdf; GX 512 (defense proposal).pdf

Dear Chambers and Judge Subramanian:

We have attached 7 exhibits. The 3 GX exhibits are the ones we had been conferring on with the government regarding 106 issues. The remaining 4 DX exhibits are those that defense counsel believes fall within the same category. We are in receipt of the Court's email regarding a letter for tonight.

Respectfully,
 Teny

From: Subramanian NYSD Chambers <SubramanianNYSDChambers@nysd.uscourts.gov>
Sent: Wednesday, May 14, 2025 5:52 PM
To: Teny Geragos <teny@agilawgroup.com>; Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>; SubramanianNYSDChambers <SubramanianNYSDChambers@nysd.uscourts.gov>
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several hearings in the weeks leading up to trial. So the Court will count on the parties to meet and confer in good faith to eliminate issues so as to avoid a preclusion motion.

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Subject: US v. Combs, 24 Cr. 542 (AS) - defense exhibits

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Respectfully,

Maurene Comey

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Teny Geragos

From: Teny Geragos
Sent: Friday, May 16, 2025 12:31 PM
To: SubramanianNYSDChambers
Cc: emily.johnson@usdoj.gov; Slavik, Christy (USANYS); Comey, Maurene (USANYS); Smyser, Madison (USANYS); Foster, Meredith (USANYS); Anna Estevao; Smyser, Madison (USANYS)
Subject: 412 - proposed revisions
Attachments: DX-1307_Redacted.pdf; DX-1022 (Govt proposal).pdf; GX B-629_Govt proposal(def request combine with B-630).pdf; DX-1376 (Govt proposal).pdf

Dear Chambers:

Attached are the proposed redactions. If these are acceptable to the Court, we will apply the additional redactions and admit after lunch. We would apply defense exhibit numbers to the government exhibits number.

Respectfully,
Teny



Teny Geragos
Partner, Agnifilo Intrater LLP
445 Park Avenue, 7th Floor | New York, NY 10022
o: (646) 205-4351 | c: [REDACTED]



teny@agilawgroup.com
www.agilawgroup.com

Teny Geragos

From: Teny Geragos
Sent: Sunday, May 18, 2025 10:01 PM
To: SubramanianNYSDChambers; Comey, Maurene (USANYS); Johnson, Emily (USANYS) 2; Foster, Meredith (USANYS); Steiner, Mitzi (USANYS); Smyser, Madison (USANYS); Slavik, Christy (USANYS)
Cc: Marc Agnifilo; thesteellawfirm; nw@westmorelandlawgroup.com; xdonaldson; Alexandra Shapiro; Anna Estevao; Jason A. Driscoll
Subject: U.S. v. Combs - Monday 5/19/25 Trial Issues

Dear Chambers and Judge Subramanian:

After meeting and conferring with the government this afternoon, the defense now understands that the government will put in a letter this evening addressing issues related to Ms. Richard, Ms. Morgan and Mr. James. We request the opportunity to be heard on the issues raised in their letter either by letter later this evening, or orally tomorrow in court. From the defense's perspective, the issues related to these witnesses are as follows:

Dawn Richard

We now understand the government is going to file a letter regarding the admissibility of Combs and former president of Bad Boy, Harve Pierre's, alleged threats to Dawn Richard.

Kerry Morgan

1. We object to Kerry Morgan testifying that the recording contract for Mr. Ventura was a "hostage" contract and that Mr. Combs is "notorious" for driving unfair bargains with his artists.
2. We object to Kerry Morgan testifying that after Ms. Ventura returned home from the IC Hotel, Ms. Ventura told her that Mr. Combs threw a potted plant at her and that "someone bought the hotel security tape for \$50,000."
"
3. We object to Kerry Morgan testifying that Ms. Ventura told her that Mr. Combs had her hold a gun when they went to a club.
4. We object to Kerry Morgan testifying that in her opinion, Mr. Combs controlled Ms. Ventura's career.
5. We object to Ms. Morgan testifying that Ms. Ventura told her that she believed Mr. Combs might have a tracker on her car.

David James

1. We object to David James testifying that Ms. Ventura told him that she does not leave Mr. Combs because he controls everything.

Respectfully,
Teny



Teny Geragos
Partner, Agnifilo Intrater LLP
445 Park Avenue, 7th Floor | New York, NY 10022
o: (646) 205-4351 | c: [REDACTED]
teny@agilawgroup.com
www.agilawgroup.com



Subject: US v. Combs
Date: Monday, May 19, 2025 at 12:54:39 PM Eastern Daylight Time
From: Jason A. Driscoll
To: SubramanianNYSDChambers
CC: Alexandra Shapiro, Jason A. Driscoll, Marc Agnifilo, teny@agilawgroup.com, Anna Estevao, nw@westmorelandlawgroup.com, thesteellawfirm, xdonaldson, Meredith Foster, Maurene Comey, Slavik, Christy (USANYS), Steiner, Mitzi (USANYS), Johnson, Emily (USANYS) 2, Smyser, Madison (USANYS)
Attachments: image001.png

Dear Chambers,

The cases cited by the government only reaffirm the defense's position regarding the hearsay statements the government intends to elicit from Kerry Morgan:

Here, where the government sought permission to introduce the notes and reports of Gonzalez during his *direct testimony*, it was clear that he would be subject to cross-examination.

United States v. Flores, 945 F.3d 687, 706 (2d Cir. 2019) (emphasis added).

Further, where the declarant has already testified and the prior consistent statement is proffered through the testimony of another witness, the Rule's "subject to cross-examination" requirement is satisfied if the opposing party is not denied the opportunity to recall the declarant to the stand for cross-examination concerning the statement. *See, e.g., United States v. Piva*, 870 F.2d 753, 758 (1st Cir.1989); *Graham* § 7012, at 162–63.

United States v. Caracappa, 614 F.3d 30, 39 (2d Cir. 2010).

Jason A. Driscoll

 Shapiro Arato Bach LLP

1140 Avenue of the Americas, 17th Floor

New York, NY 10036

212-257-4898 (o)

jdriscoll@shapiroarato.com

www.shapiroarato.com

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Teny Geragos

From: Teny Geragos
Sent: Monday, May 19, 2025 10:00 PM
To: Comey, Maurene (USANYS); SubramanianNYSDChambers
Cc: Johnson, Emily (USANYS) 2; Slavik, Christy (USANYS); Steiner, Mitzi (USANYS); Smyser, Madison (USANYS); Foster, Meredith (USANYS); Marc Agnifilo; thesteellawfirm; xdonaldson; nw@westmorelandlawgroup.com; Alexandra Shapiro; Jason A. Driscoll; Anna Estevao
Subject: RE: US v. Combs, 24 Cr. 542 (AS) - Order of Witnesses for Tuesday 5/20

Dear Chambers:

Pursuant to the Court's Order, we write to let the Court know of legal issues we expect may arise tomorrow:

With respect to Ms. Regina Ventura's testimony, the defense may object to the government eliciting testimony from Ms. Ventura regarding a \$20,000 payment to Mr. Combs at the end of December of 2011. We still are conferring with the government on this point. Neither party will address this issue in writing this evening or tomorrow morning, and we request additional time to consider it and raise it tomorrow morning at 8:30am, if necessary.

The defense does not foresee any other legal issues arising before tomorrow morning's testimony.

Respectfully,
Teny

From: Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>
Sent: Monday, May 19, 2025 8:42 PM
To: SubramanianNYSDChambers <SubramanianNYSDChambers@nysd.uscourts.gov>
Cc: Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Slavik, Christy (USANYS) <Mary.Slavik@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Smyser, Madison (USANYS) <Madison.Smyser@usdoj.gov>; Foster, Meredith (USANYS) <Meredith.Foster@usdoj.gov>; Teny Geragos <teny@agilawgroup.com>; Marc Agnifilo <marc@agilawgroup.com>; thesteellawfirm <thesteellawfirm@msn.com>; xdonaldson <xdonaldson@aol.com>; nw@westmorelandlawgroup.com; Alexandra Shapiro <ashapiro@shapiroarato.com>; Jason A. Driscoll <jdriscoll@shapiroarato.com>; Anna Estevao <aestevao@harristrz.com>
Subject: US v. Combs, 24 Cr. 542 (AS) - Order of Witnesses for Tuesday 5/20

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Good evening,

The Government writes to alert the Court and the defense of an adjustment to its anticipated order of witnesses for tomorrow. We currently expect to call witnesses in the following order tomorrow:

- David James (currently on direct)
- Regina Ventura
- Sharay Hayes
- Gerard Gannon

Those four witnesses will almost certainly take the full day tomorrow. In addition, the Government now expects to call a custodian from L'Ermitage on Thursday, May 22nd. Although the Government is still assessing, it is possible that Jourdan Atkinson may not testify until a later week in the trial. We will promptly alert the Court and the defense when we have more definite timing regarding Ms. Atkinson's testimony.

Respectfully,

Maurene Comey
Assistant United States Attorney
Southern District of New York
26 Federal Plaza, 37th Floor
New York, NY 10278


Maurene.Comey@usdoj.gov

Teny Geragos

From: Teny Geragos
Sent: Tuesday, May 20, 2025 9:57 PM
To: The Steel Law Firm P.C. Firm PC; SubramanianNYSDChambers; Marc Agnifilo; Alexandra Shapiro; Anna Estevao; Jason A. Driscoll; jbach@shapiroarato.com; nw@westmorelandlawgroup.com; xdonaldson; Johnson, Emily (USANYS) 2; Smyser, Madison (USANYS); mary.slavik@usdoj.gov; Foster, Meredith (USANYS); Steiner, Mitzi (USANYS); Comey, Maurene (USANYS)
Subject: RE: 24cr542 USA v. Combs
Attachments: DX-402.pdf; DX-406.pdf

Apologies for not including the potential defense exhibits referenced on page 1 of the letter. We have attached them here.

From: The Steel Law Firm P.C. Firm PC <thesteellawfirm@msn.com>
Sent: Tuesday, May 20, 2025 9:55 PM
To: SubramanianNYSDChambers <SubramanianNYSDChambers@nysd.uscourts.gov>; Marc Agnifilo <marc@agilawgroup.com>; Teny Geragos <teny@agilawgroup.com>; Alexandra Shapiro <ashapiro@shapiroarato.com>; Anna Estevao <aestevao@harristrz.com>; Jason A. Driscoll <jdriscoll@shapiroarato.com>; jbach@shapiroarato.com; nw@westmorelandlawgroup.com; xdonaldson <xdonaldson@aol.com>; Johnson, Emily (USANYS) 2 <Emily.Johnson@usdoj.gov>; Smyser, Madison (USANYS) <madison.smyser@usdoj.gov>; mary.slavik@usdoj.gov; Foster, Meredith (USANYS) <meredith.foster@usdoj.gov>; Steiner, Mitzi (USANYS) <Mitzi.Steiner@usdoj.gov>; Comey, Maurene (USANYS) <Maurene.Comey@usdoj.gov>
Subject: RE: 24cr542 USA v. Combs

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Your Honor: Please see the attached letter summarizing potential witness issues for May 21, 2025.

Brian Steel
The Steel Law Firm, P.C.
1800 Peachtree Street, Ste 300
Atlanta, GA 30309
[REDACTED] (Phone)
404-352-5636 (FAX)
www.thesteellawfirm.com

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